EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

PROUDLION IP, LLC,)	
Plaintiff,)	
)	Civil Action No. 4:23-cv-02050
v.)	
)	
MONTBLANC NORTH AMERICA,)	JURY TRIAL DEMANDED
LLC,)	
Defendant.)	

[PROPOSED] SCHEDULING ORDER

It is hereby **ORDERED** that the following schedule and the Rules of Practice for Patent Cases in the Southern District of Texas will apply in this case:

		Scheduling Conference
1	November 1, 2023	PRELIMINARY INFRINGEMENT CONTENTIONS Comply with P.R. 3-1 and P.R. 3-2. After this date, it is necessary to obtain leave of court to add and/or amend infringement contentions, pursuant to Patent Rule (P.R.) 3-7. JOIN ADDITIONAL PARTIES OR ADD NEW
		PATENTS AND/OR CLAIMS It is not necessary to file a motion to join additional parties before this date. Thereafter, it is necessary to obtain leave of court.
2	January 10, 2024	PRELIMINARY INVALIDITY CONTENTIONS Comply with P.R. 3-3 and 3-4. <u>After this date</u> , it is necessary to obtain leave of Court to add and/or amend invalidity contentions, pursuant to P.R. 3-7.
		INEQUITABLE CONDUCT ALLEGATIONS Before this date, it is not necessary to file a motion for leave to add inequitable conduct allegations. Thereafter, it is necessary to obtain leave of court to add inequitable conduct allegations.

3	January 24, 2024	EXCHANGE PROPOSED TERMS AND CLAIM ELEMENTS FOR CONSTRUCTION Comply with P.R. 4-1.
4	February 14, 2024	EXCHANGE PRELIMINARY CLAIM CONSTRUCTIONS AND EXTRINSIC EVIDENCE Comply with P.R. 4-2.
5	March 13, 2024	JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT Comply with P.R. 4-3.
6	March 13, 2024	AMEND PLEADINGS It is not necessary to file a Motion for Leave to Amend before the deadline to amend pleadings.
7	April 3, 2024	DISCOVERY DEADLINE ON CLAIM CONSTRUCTION ISSUES See P.R. 4-4.
8	April 10, 2024	TECHNOLOGY TUTORIAL DEADLINE Provide Court with technology tutorials (optional).
9	April 24, 2024	OPENING CLAIM CONSTRUCTION BRIEF Comply with P.R. 4-5(a)(1).
10	May 8, 2024	RESPONSIVE CLAIM CONSTRUCTION BRIEF Comply with P.R. 4-5(a)(2).
11	May 15, 2024	REPLY CLAIM CONSTRUCTION BRIEF Comply with P.R. 4-5(a)(3).
12	1 week <i>before Markman</i> Hearing	JOINT CLAIM CONSTRUCTION CHART Comply with P.R. 4-5(b) and (c).
13	On or around June 26, 2024	CLAIM CONSTRUCTION (MARKMAN) HEARING at 10 a.m. at the United States District Court, Courtroom 9F, Houston, Texas.

14	On or around August 7, 2024	Court's Decision on Claim Construction (Markman Ruling) (If ruling is late. parties may seek amendment of remaining dates in Scheduling Order.)
15	4 weeks after <i>Markman</i> Ruling	DEADLINE FOR FINAL INFRINGEMENT CONTENTIONS AND TO AMEND PLEADINGS ON INFRINGEMENT CLAIMS NOTE: Except as provided in P.R. 3-6, if the amendment would affect preliminary or final infringement contentions, a motion must be made under P.R. 3-7 irrespective of whether the amendment is made before this deadline.
16	5 weeks after <i>Markman</i> Ruling	PRIVILEGE LOGS/WILLFULNESS Comply with P.R.3-8 All parties furnish privilege logs by this date.
17	6 weeks after <i>Markman</i> Ruling	DEADLINE FOR FINAL INVALIDITY CONTENTIONS AND TO AMEND PLEADINGS ON INVALIDITY CLAIMS. NOTE: Except as provided in P.R. 3-6, if the amendment would affect preliminary or final invalidity contentions, a motion must be made under P.R. 3-7 irrespective of whether the amendment is made before this deadline.
18	11 weeks after Markman Ruling	COMPLETION OF FACT DISCOVERY Written discovery requests are NOT timely if they are served so close to this deadline that under the Fed. R. Civ. P. the response would not be due until after this deadline.
19	13 weeks after <i>Markman</i> Ruling	DESIGNATION OF EXPERTS AND REQUIRED REPORTS OTHER THAN CLAIM CONSTRUCTION AND ATTORNEYS' FEES Party with burden of proof ("BOP") on non-construction and fees issues shall comply with Fed. R. Civ. P.26(a)(2)(A-C).
20	17 weeks after <i>Markman</i> Ruling	DESIGNATION OF RESPONSIVE EXPERTS AND REQUIRED REPORTS Party not having BOP on non-construction and fees issues shall comply with Fed. R. Civ. P. 26(a)(2)(A-C).
21	21 weeks after <i>Markman</i> Ruling	COMPLETION OF EXPERT DISCOVERY

22	28 weeks after <i>Markman</i> Ruling	DISPOSITIVE AND NON-DISPOSITIVE MOTIONS DEADLINES (INCLUDING <i>DAUBERT</i> MOTIONS)
23	3 weeks before Docket Call	JOINT PRETRIAL ORDER AND MOTION IN LIMINE DEADLINE The Joint Pretrial Order will contain the pretrial disclosures required by Fed. R. Civ. P. Rule 26(a)(3), Local Rules and this Court's procedures. Plaintiff is responsible for timely filing the complete Joint Pretrial Order. Failure to file a Joint Pretrial Order timely may lead to dismissal or other sanction in accordance with the applicable rules.
24	1 week prior to trial date	DOCKET CALL/ FINAL PRETRIAL CONFERENCE at the United States District Court, Courtroom 9F, Houston, Texas.
25	1 week prior to Docket Call/Final Pretrial Conference	MEDIATION TO BE COMPLETED BY THIS DATE The parties must select a mediator for this case. The parties and mediator must comply with S.D. TEXAS LOCAL RULE 16.
26	TBD	JURY SELECTION AND TRIAL commences, subject to Court's criminal docket

HON. CHARLES ESKRIDGE
UNITED STATES DISTRICT JUDGE

SIGNED at ______, Texas, this ______ day of _________, 2023.